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Attorney for Enrique Quintero

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

) Case Nos. CR11-00550-EJD
) CR11-00711-EJD
)
)
)

V.

) **STIPULATION AND**
) **~~PROPOSED~~ ORDER CONTINUING**
) **STATUS CONFERENCE AND**
) **EXCLUDING TIME FROM JUNE 4,**
) **2012 THROUGH JUNE 25, 2012**
)
)
)

ENRIQUE QUINTERO,

Defendant.

Plaintiff United States of America, by and through their counsel Assistant United States Attorney, Thomas O'Connell, and defendant Enrique Quintero, by and through his attorney Michelle D. Spencer, hereby stipulate and agree that, subject to the Court's approval, that the status conferences currently scheduled in the above-entitled cases for June 4, 2012 should be continued to June 25, 2012 at 1:30 p.m. so that defense counsel can conduct additional investigation and case preparation.

1 The parties further stipulate that time should be excluded under the Speedy Trial Act from
2 June 4, 2012 through June 25, 2012 for continuity of counsel and effective preparation.

3 IT IS SO STIPULATED.

4 MELINDA HAAG
United States Attorney

5 Date: May 29, 2012

6 /S/
7 THOMAS O'CONNELL
Assistant United States Attorney

8 Date: May 29, 2012

9 /MDS/
10 MICHELLE D. SPENCER
Attorney for Enrique Quintero

11
12 ~~PROPOSED~~ ORDER

13 Based upon the foregoing stipulation of the parties, and good cause appearing therefor, the
14 Court finds that failing to exclude the time from June 4, 2012 through June 25, 2012 would
15 unreasonably deny the defendant continuity of counsel and the reasonable time necessary for effective
16 preparation, taking into account the exercise of due diligence pursuant to 18 U.S.C. §
17 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from
18 June 4, 2012 through June 25, 2012 from computation under the Speedy Trial Act outweigh the best
19 interests of the public and the defendant in a speedy trial.

20 Therefore, IT IS HEREBY ORDERED that the time from June 4, 2012 through and including
21 June 25, 2012 shall be excluded from computation under the Speedy Trial Act.

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23 Date: May 30, 2012

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HON. EDWARD J. DAVILA
United States District Judge